

Monte J. White & Associates, P.C.
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IN THE UNITED STATE BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION

IN RE:	§	CASE NO.09-70408-HDH
Delbert Lee Lewis	§	
and	§	CHAPTER 13
Shirley Don Lewis	§	
Debtor(s)	§	
	§	

MOTION TO WAIVE WAGE DIRECTIVE

NOW COMES, Delbert Lee Lewis and Shirley Don Lewis, in the above-styled and numbered cause, and file this Motion to Waive Wage Directive on behalf of Debtor(s), and in support thereof would respectfully show unto the Court as follows:

1. Debtor(s) filed a Chapter 13 Bankruptcy on 8/19/2009.
2. Debtor(s) are asking the Court to waive the requirement of payroll deduction for their Chapter 13 payment. Debtor works for a small egg farm operation in a small town, and feels that his position would be terminated if a wage directive was ordered.
3. Joint Debtor is retired and does not work, however, she receives a reliable, recurring deposit from her son and retirement funds that will cover their plan payment. Debtor(s) are in a 100% plan.

WHEREFORE, Debtor(s) Delbert Lee Lewis and Shirley Don Lewis, pray that the Motion to Waive Wage Directive filed on Behalf of Debtor(s) be granted and for such other and further relief to which said Debtor(s) may be entitled, either at law or in equity.

Respectfully submitted,

/s/Monte J. White, SBN 00785232
Attorney for debtor(s)

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that on 8/26/2009 the office of the Chapter 13 Trustee was contacted and this office was advised that the Trustee

- ☒ does not oppose the motion
- ☐ opposes the motion

s/Monte J. White
Attorney for Debtor

CERTIFICATE OF SERVICE

I, Monte J. White, do hereby certify that I served a true and correct copy of the foregoing Motion to the parties listed on the mailing matrix by ECF and/or regular mail on 8/31/2009.

s/Monte J. White
Attorney for Debtor

Case 09-70408-hdh13	Doc 10	Filed 08/31/09	Entered 08/31/09 14:44:04	Desc Main
Label Matrix for local noticing	1100 Commerce Street	Document	Page 3 of 3	Apoloww Valero
0539-7	Room 1254			1300 Green
Case 09-70408-hdh13	Dallas, TX 75242-1305			Quanah, TX 79252-6628
Northern District of Texas				
Wichita Falls				
Thu Aug 27 14:43:57 CDT 2009				
Debt Recovery Associat	HSBC			Hardeman Co Appraisal District
111 Smith Hines Rd Ste F	ATTN: BANKRUPTCY			PO Box 388
Greenville, SC 29607-5745	PO BOX 5213			Quanah, TX 79252-0388
	Carol Stream, IL 60197-5213			
Herring Bank	IRS Special Procedures			Monte J. White & Associates
1900 Pease St	1100 Commerce St., Room 951			1106 Brook Ave
Vernon, TX 76384-4608	Mail Stop 5029 DAL			Wichita Falls TX 76301-5009
	Dallas, TX 75242-1001			
Palisad Coll	Rshk-cbsd			Wells Fargo
Attention: Bankruptcy Department	Attn.: Centralized Bankruptcy			PO Box 60510
PO Box 100018	PO Box 20507			Los Angeles, CA 90060-0510
Kennesaw, GA 30156-9204	Kansas City, MO 64195-0507			
Delbert Lee Lewis	Monte J. White			Shirley Don Lewis
Box 118	Monte J. White & Associates, P.C.			Box 118
Chillicothe, TX 79225-0118	1106 Brook Avenue			Chillicothe, TX 79225-0118
	Hamilton Place			
	Wichita Falls, TX 76301-5009			
UST U.S. Trustee	Walter 12,13 Ocheskey			End of Label Matrix
1100 Commerce Street	6308 Iola Avenue			Mailable recipients 16
Room 976	Lubbock, TX 79424-2735			Bypassed recipients 0
Dallas, TX 75242-1011				Total 16